

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1, individually, and on behalf of all others similarly situated, JANE DOE 2, individually and on behalf of all others similarly situated, JANE DOE 3, individually and on behalf of all others similarly situated, JANE DOE 4, individually and on behalf of all others similarly situated and JANE DOE 5, individually and on behalf of all others similarly situated;

Plaintiffs,

vs.

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, FIRST LADY CECILE DE JONGH, GOVERNOR KENNETH MAPP, SENATOR CELESTINO WHITE, ATTORNEY GENERAL VINCENT FRAZER, GOVERNOR JOHN DE JONGH, SENATOR CARLTON DOWE, DELEGATE STACEY PLASKETT, and JOHN DOES 1-100;

Defendants.

No.: 1:23-cv-10301-AS

**DEFENDANT GOV. JOHN DE  
JONGH JR.'S NOTICE OF  
JOINDER WITH /  
INCORPORATION OF CO-  
DEFENDANTS' REPLIES TO  
PLAINTIFFS' OPPOSITION**


PLEASE TAKE NOTICE that, Defendant Governor John de Jongh [Jr.] (hereinafter "JdJ") by and through undersigned counsel, Daniel L. Cevallos, Cevallos & Wong LLP, due to page limitations, hereby JOINS in GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, FIRST LADY CECILE DE JONGH, GOVERNOR KENNETH MAPP, SENATOR CELESTINO WHITE, ATTORNEY GENERAL VINCENT FRAZER, SENATOR CARLTON DOWE, DELEGATE STACEY PLASKETT, and all defendants' arguments contained in their filed and forthcoming replies to the 8/14/24 Plaintiffs JANE DOES 1-5's *Memorandum of Law in Opposition to Motions to Dismiss* [ECF # 148-1] ("Opposition"). JdJ incorporates all arguments applicable to JdJ raised in those Replies, to the extent not already raised, or to the extent such Replies further brief and expand upon issues raised and grounds for

dismissal/transfer raised by JdJ, or to the extent defendants' motions raise new grounds for dismissal or transfer that apply to JdJ. Similarly, due to page limitations (JdJ has ten pages to respond to 82 pages of opposition) JdJ states that the absence of a specific response to a point in the Opposition is due to page limitations, and not because JdJ concedes any points in the Opp. He does not.

Defendant *respectfully* reserves the right to further join and incorporate future arguments by co-defendants.

Dated: *August 26, 2024*  
New York, New York



  
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Admitted Pro Hac Vice [ECF #21]  
*Attorneys for Governor John de Jongh, Jr.*

AFFIRMATION OF SERVICE

I, Daniel L. Cevallos, Esq., declare under penalty of perjury that on the below date, I filed the foregoing via the Court's Electronic Case Filing system, which will send a Notice of Electronic Filing (NEF) to all those who have appeared of record on the NYSD ECF system.

Dated: *August 26, 2024*  
New York, New York



A handwritten signature in blue ink, appearing to be 'D. Cevallos', written over a horizontal line.

Daniel L. Cevallos, Esq.

AFFIRMATION OF COMPLIANCE WITH  
PAGE LIMITS / FORMATTING

The undersigned hereby confirms that the within filing complies with Judge Subramanian's *Individual Practices in Civil Cases*, Rule 8(C) (3 pages, including tables, captions, and signature lines) and Local Civil Rule 11.1.

Dated: *August 26, 2024*  
New York, New York



A handwritten signature in blue ink, appearing to be 'D. Cevallos', written over a horizontal line.

Daniel L. Cevallos, Esq.